

1 The Honorable Benjamin H. Settle
2
3
4
5
6
7
8

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

9 COMMANDER EMILY SHILLING; *et al.*,

10 *Plaintiffs,*

11 *v.*

12 DONALD J. TRUMP, in his official capacity as
13 President of the United States; *et al.*,

14 *Defendants.*

No. 2:25-cv-00241 BHS

**DECLARATION OF OMAR
GONZALEZ-PAGAN IN SUPPORT
OF PLAINTIFFS' REPLY IN
SUPPORT OF MOTION FOR
PRELIMINARY INJUNCTION**

15 I, Omar Gonzalez-Pagan, hereby declare as follows:

16 1. I am an attorney with Lambda Legal Defense and Education Fund, Inc. and
17 counsel for Plaintiffs in the above-captioned matter. I make this declaration based on personal
18 knowledge about which I am competent to testify.

19 2. I submit this declaration to provide the Court true and correct copies of certain
20 documents submitted in support of Plaintiffs' Motion for Preliminary Injunction.

21 3. Attached as **Exhibit 37** is a true and correct copy temporary restraining order
22 issued by the United States District Court for the District of New Jersey in *Ireland v. Hegseth*,
23 No. 1:25-cv-01918-CPO-AMD, on March 24, 2025.

24
25
26
DECLARATION OF OMAR
GONZALEZ-PAGAN ISO
PLAINTIFFS' REPLY ISO
MOT. FOR PRELIM. INJ.
(CASE NO. 2:25-CV-241 BHS)

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

Lambda Legal Defense and
Education Fund, Inc.
120 Wall Street, 19th Floor
New York, NY. 10005-3919
Telephone: 212-809-8585

Human Rights Campaign
Foundation
1640 Rhode Island Avenue NW
Washington, D.C. 20036
Telephone: (202) 568-5762

4. Attached as **Exhibit 38** is a true and correct copy of the transcript of the March 21, 2025 motions hearing in *Talbott v. United States*, No. 1:25-cv-00240-ACR, before the United States District Court for the District of Columbia.

5. Attached as **Exhibit 39** is a true and correct screenshot of a post on the social media platform X (formerly Twitter) by Defendant Pete Hegseth (@PeteHegseth) on March 22, 2025, and retrieved from X.com at: <https://x.com/PeteHegseth/status/1903529403151249656>.

EXECUTED this 25th day of March 2025, at Seattle, Washington.

s/ Omar Gonzalez-Pagan
Omar Gonzalez-Pagan

DECLARATION OF OMAR
GONZALEZ-PAGAN ISO
PLAINTIFFS' REPLY ISO
MOT. FOR PRELIM. INJ. – 2
(CASE NO. 2:25-CV-241 BHS)

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

**Lambda Legal Defense and
Education Fund, Inc.**
120 Wall Street, 19th Floor
New York, NY. 10005-3919
Telephone: 212-809-8585

**Human Rights Campaign
Foundation**
1640 Rhode Island Avenue NW
Washington, D.C. 20036
Telephone: (202) 568-5762